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JUSTIN M. REILLY, ESQ.  
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PARALEGALS

ROSA COSCIA  
FRANCIS PENA

**Via: SDNY ECF**

**November 25, 2020**

Honorable Judge Alison J. Nathan  
United States District Judge  
U.S.D.C. | S.D.N.Y.  
40 Foley Square  
New York, New York 10007

**Re: *Gutierrez Hernandez, et al v. Marcel Cleaners, Inc., et al.*; 19-CV-10090 (AJN)(SN)**

Dear Hon. Judge Nathan,

This office represents the Plaintiffs in the above-referenced FLSA action. Kindly accept this letter motion as Plaintiffs' request to adjourn the deadline on which the parties are to file a joint status letter, as directed in Your Honor's November 24, 2020 Order [D.E. 40], currently scheduled for November 27, 2020, and to adjourn the Status Conference currently scheduled for November 30, 2020. I will be unavailable due to personal reasons until December 1, 2020. I informed Defendants' counsel, Mr. Jonathan Silver, of my pending unavailability and that we would need to file the joint status letter today. For reasons explained below, Mr. Silver has stopped responding to my emails, necessitating Plaintiffs to make this application without Defendants' consent. SO ORDERED.

Earlier this evening, Plaintiffs filed a motion to compel in response to numerous discovery delays caused by Defendants, including their failure to produce adequate responses to Plaintiffs' second set of document requests and first request to admit, as well as Defendants' failure to agree to a date on which to provide sworn deposition testimony. Counsel for the parties exchanged numerous emails in an attempt to resolve the dispute; however, Mr. Silver stopped responding altogether earlier this afternoon, even though he was fully aware that we needed to submit a joint status letter.

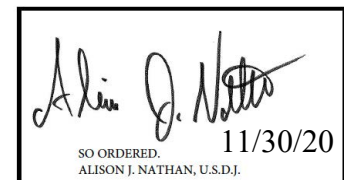
Accordingly, Plaintiffs respectfully request that the Court adjourn the aforementioned dates until after Plaintiffs' Motion to Compel is determined.

SO ORDERED.

Thank you for your time and attention to this matter.

Respectfully submitted,

  
Keith E. Williams, Esq.



cc: all counsel of record via ECF